

**CONFIDENTIAL ATTORNEY CLIENT COMMUNICATION
DRAFT FOR CLIENT REVIEW 1.29.2014****UPPER COLUMBIA RIVER/LAKE ROOSEVELT SUPERFUND SITE
OUTLINE OF ACTION PLAN
DEVELOPED ON JANUARY 22, 2014
FOR
EXPEDITED RI/FS SCHEDULE/ INTERIM ACTION PLAN**

On January 22, 2014, representatives of the Four Sovereign Governmental CERCLA response entities (EPA, DOI, CCT, STI and WA), at the Upper Columbia River/Lake Roosevelt Superfund Site (UCR Site), met in Seattle, Washington to further discuss the status of the ongoing RI/FS process and to identify steps to be taken under the TCM/EPA Agreement and CERCLA to expedite the RI/FS schedule and implement interim remedial actions at the UCR Site. At the close of that intergovernmental strategy meeting, there was consensus that *the following action items needed to be completed within the course of the next two to six months.*

1. **EPA will take measures aimed at expediting the RI/FS:** EPA will continue to take an increasingly stringent approach with TCM and require strict performance of TCM's contractual obligations, including timely production of high quality work products. To achieve this goal, EPA will use the following two approaches:
 - A. **Cooperative Approach:** Dennis Faulk plans to meet with TCM representative Dave Godlewski in February, 2014, and provide an overview of the Four Sovereign's concerns with the progress of the RI/FS process. Specifically, Mr. Faulk will explain that (1) There needs to be a change in the way TCM and EPA work together; (2) Interim Actions are being evaluated and will be performed in the near future; and (3) Sediment Transport needs to be evaluated.
 - B. **Enforcement Approach:** EPA will evaluate the tools available for increased enforcement of the contract and implement the tools as needed.
2. **The Four Sovereigns Technical Team will continue to develop and implement a revised RI/FS and Interim Action Plan:** The Four Sovereigns Technical Team will meet in February and continue to develop a plan for expediting the RI/FS and performing interim actions. The Four Sovereigns Technical Team will perform the following tasks:
 - A. **Identify specific technical issues necessary for evaluation.** The Technical Team will identify technical issues necessary to advance the RI/FS. The Technical Team will use the December 13, 2013 meeting summary and the 2007 CSTAG Recommendations as a guide for developing specific tasks. Technical issues to be evaluated may include (1) Nature and Extent/Fate and Transport; (2) Interim Actions; (3) Lakes and Wetlands; and (4) Risk Assessment.

- B. Create Technical Subcommittees. Identify the chair and members of each Technical Subcommittee, and develop the subcommittee objectives, meeting schedule, deadlines.
 - C. Subcommittee Objectives: The subcommittees should develop objectives and goals and a plan for achieving those objectives and goals. The subcommittees' work should include identification of barriers to achieving the objectives, such as insufficient funding, lack of specific expertise, and legal or political obstacles.
3. Quarterly Legal Team Meetings: The Four Sovereigns Legal Team will meet by phone one time per quarter to address any legal issues identified by the Technical Team.